

### **REMARKS/ARGUMENTS**

Claims 1-41 are pending in the application. Claim 40 is amended. The amendments to the claims as indicated herein do not add any new matter to this application.

### **SUMMARY OF THE REJECTIONS/OBJECTIONS**

Claim 40 was objected to because of an informality.

Claims 1-41 were rejected under 35 USC § 103(a) as being unpatentable over Li (U.S. Pat. 6,012,088, hereinafter "*Li*") in view of Fijolek (U.S. Pat. No. 6,351,773, hereinafter "*Fijolek*").

### **OBJECTION TO CLAIMS**

Applicants respectfully submit that by amending Claim 40 as set forth herein, the applicants have overcome the objections to the claims. Removal of the objections is requested.

### **THE PENDING CLAIMS ARE PATENTABLE OVER LI IN VIEW OF FIJOLEK**

Claims 1-41 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over *Li* and further in view of *Fijolek*.

Applicants respectfully traverse.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143.

The *Li* and *Fijolek* references do not teach at least the following limitation in independent Claim 1: **"obtaining, using the secondary signaling technology, a unique link identifier that**  
(SEQ NO. 7120)



is associated with the network link using the secondary signaling technology”. Although Li teaches an Internet access device with at least two physical interfaces, nowhere does it disclose obtaining a unique link identifier associated with one of these two physical interfaces.

The combination of *Li* with *Fijolek* also fails to teach the limitation in independent Claim 1 described above. *Fijolek* merely discloses that a network device receiving a connection request from a requesting device may examine a database to see if information about the requesting device, such as a telephone number, is available. However, *Fijolek* does not teach using telephone numbers as authentication IDs. More significantly, *Fijolek* does not teach obtaining a telephone number or any other unique link identifier using a secondary signaling technology. In fact, the telephone numbers mentioned in *Fijolek* are obtained from information already stored on databases.

Similarly, the combined *Li* and *Fijolek* references also fail to teach at least the following limitations in independent Claims 10, 14, 15, 24, and 33:

in independent Claim 10: “obtaining, using the ISDN line, an ISDN telephone number uniquely associated with the ISDN line”;

in independent Claim 14: “obtaining, using the secondary signaling technology, a unique link identifier associated with the network link”;

in independent Claim 15: “obtaining, using the secondary signaling technology, a unique link identifier associated with the network link using the secondary signaling technology”

in independent Claim 24: “means for obtaining, using the secondary signaling technology, a unique link identifier associated with the network link using the secondary signaling technology”; and



in independent Claim 33: instructions for “obtaining, using the secondary signaling technology, a unique link identifier associated with the network link using the secondary signaling technology”.

Consequently, it is respectfully submitted that, for at least the above reasons, *Li* in view of *Fijolek* does not disclose, teach, or suggest the limitations of Claims 10, 14, 15, 24, and 33. As such, it is respectfully submitted that Claims 10, 14, 15, 24, and 33 are patentable over the cited art and are in condition for allowance.

#### **REMAINING CLAIMS**

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each of the dependant claims includes the limitations of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional limitations that independently render them patentable. Due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time.



**CONCLUSION**

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

Hickman Palermo Truong & Becker LLP

Dated: May 14, 2007

Yp Liao  
Yiping R. Liao  
Reg. No. 60,301

2055 Gateway Place, Suite 550  
San Jose, CA 95110-1089  
Telephone: (408) 414-1080  
Fax: (408) 414-1076

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450

on 5/14/2007 by Susan Jensen  
Susan Jensen